

**State of California
AIR RESOURCES BOARD**

**Status Report on Imperial County Air Quality and
Approval of the State Implementation Plan Revision for PM₁₀**

Release Date: April 26, 2010



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I. Imperial County Air Quality

A. Profile of Imperial County

Imperial County is located in the southeast corner of California. As shown in Figure 1, the County extends over 4,597 square miles, bordering Mexico to the south, Riverside County to the north, San Diego County to the west, and Arizona to the east. With a population of approximately 170,000, the principal industries in Imperial County are year-round irrigated farming and retail trade. Few stationary sources are located in the region. Most of the population, farming, and retail trade exists in a narrow band of land in the central portion of the county. This region comprises on average less than 1/4th the width of the county and stretches from the south shore of the Salton Sea to the Mexican border. The remaining land in Imperial County consists of large expanses of open desert, primarily managed by the federal government, including some of the largest sand dunes in the State. This arid region receives less than 3 inches of rainfall a year.

Imperial County faces additional air quality challenges due to its proximity to the large international city of Mexicali, Mexico. Mexicali has a population of over one million people and is located just across the international border from Calexico. As shown in Table 1, NO_x and VOC emissions in the city of Mexicali are twice those of the entire county of Imperial, and SO_x emissions are more than 10 times higher. Several major border crossings are also located in Calexico.

Figure 1. Map of Imperial County

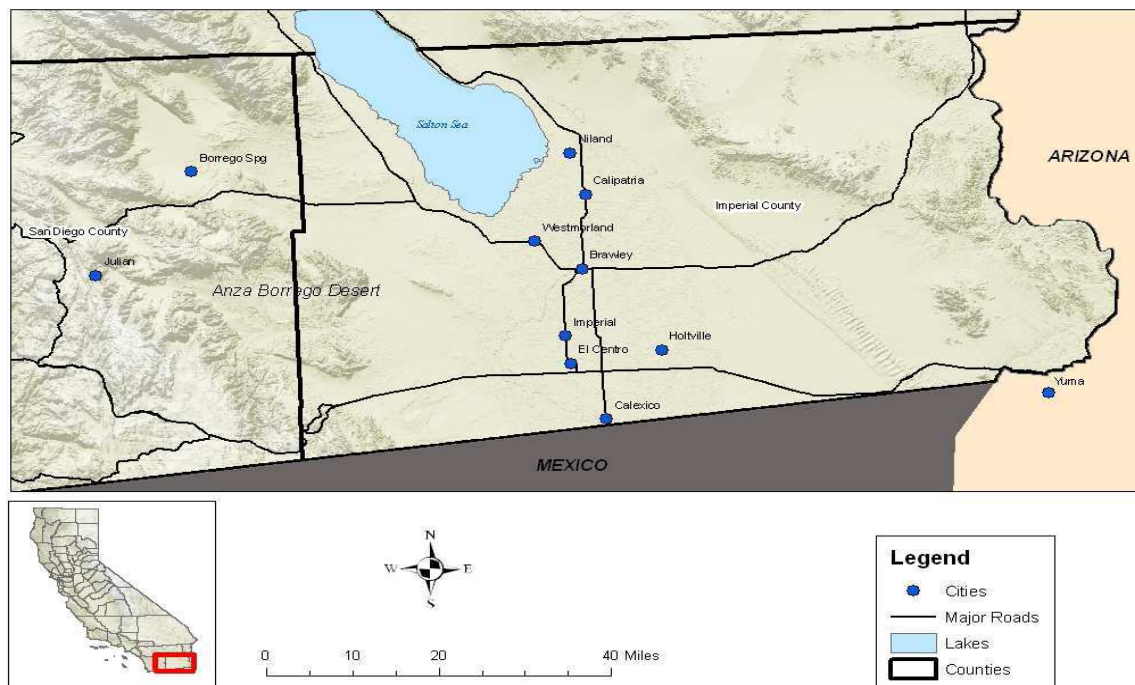


Table 1. Imperial County/Mexicali 2005 Emissions in tons per day (tpd)

	SO _x		NO _x		ROG/VOC	
Source Type	City of Mexicali	Imperial County	City of Mexicali	Imperial County	City of Mexicali	Imperial County
Stationary	12.7	0.2	39.38	3.56	2.0	1.31
Area	0.5	0.1	3.3	0.9	41.92	17.08
Mobile	0.6	0.6	35.77	27.31	26.13	14.98
Total	13.8	0.9	78.45	31.77	70.05	33.37

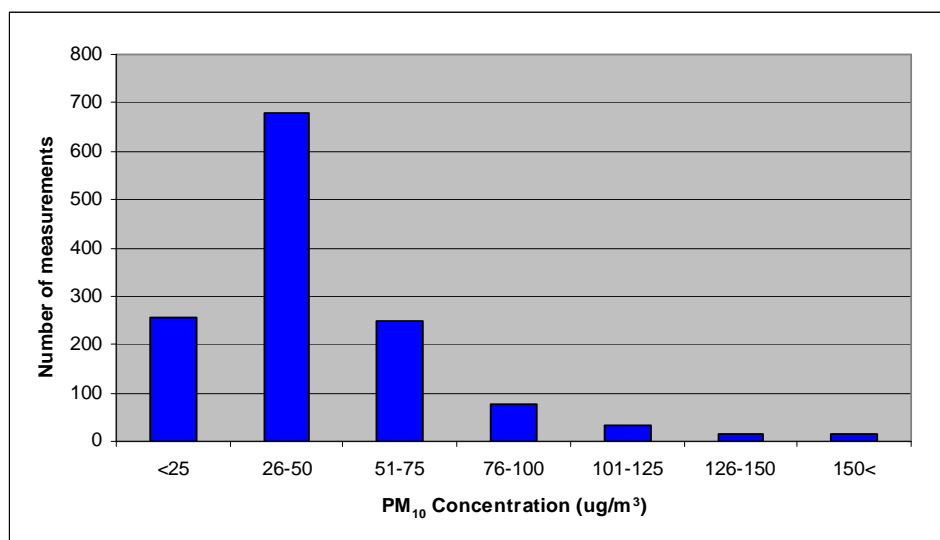
B. Historical Air Quality

Despite the unique challenges that Imperial County's geography, climatology, and proximity to Mexico pose for air quality, the combined efforts of State and local control programs have resulted in improving air quality in the region. The following sections characterize the nature of current particulate matter and ozone conditions and provide an overview of progress.

1. Coarse Particulate Matter (PM₁₀)

Because Imperial County is an arid, desert region, PM₁₀ concentrations are dominated by fugitive dust, but are generally quite low. As shown in Figure 2, more than 70% of the PM₁₀ concentrations measured between 2005 and 2008 were less than 50 ug/m³, and more than 95% were below 100 ug/m³. Concentrations exceed the federal 24-hour PM₁₀ standard of 150 ug/m³ on average once or twice a year at any given location. These infrequent occurrences are due to two distinct types of conditions – transport of emissions from Mexico, or naturally occurring high winds.

Figure 2. Distribution of PM₁₀ Concentrations in Imperial County (2005-2008)



The impact of transport from Mexico is seen primarily at monitors in Calexico that are near the international border. These transport-related exceedances occur during the winter months when conditions are stagnant, and emissions from Mexicali accumulate near the border. Research into PM_{10} concentration differences between Mexicali and Calexico showed that average cross border transport of PM_{10} from Mexico was three times higher than from the U.S., and that concentrations in Mexico were almost double those at Calexico (Chow. et. al., 2000). Increased residential trash and wood burning and charbroiling in Mexicali, often associated with cultural activities during holiday periods, are believed to be the primary cause of the transport exceedances at Calexico. Figure 3 is an image from the Mexicali newspaper La Cronica that illustrates reduced air quality on January 1, 2009.

Figure 3. Photo of the Pollution on January 1, 2009 in Mexicali



The second type of condition that causes elevated PM_{10} levels in Imperial County is high winds. These high winds events typically occur once or twice a year, usually between the months of April and September. Because of the large amount of open desert land, coupled with the limited rainfall, elevated wind speeds can loft and disperse large amounts of fugitive dust throughout the County. Figure 4 is a photograph taken in the western portion of Imperial County on April 15, 2008 that shows the impact of wind-generated dust. Evaluation of data between 2004 and 2008 found that after identifying exceedances due to international transport, all remaining exceedances occurred only once wind speeds exceeded 20 miles per hour (mph), with most occurring under conditions when winds reached over 30 mph. Recognizing that these types of naturally occurring high wind conditions are not controllable, United States Environmental Protection Agency (U.S. EPA) regulations allow areas to identify natural events such as high wind days and exclude them from use in determinations of a region's air quality.

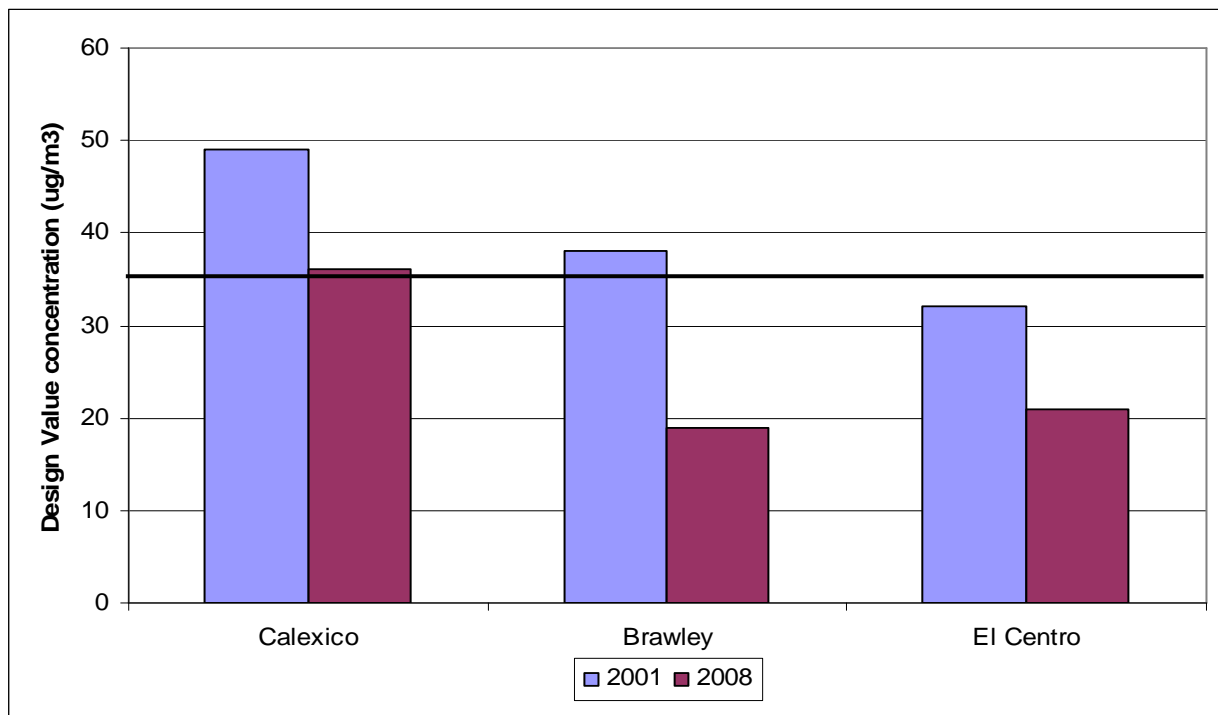
Figure 4. Photo of Windblown Dust on April 15, 2008



2. Fine Particulate Matter (PM_{2.5})

Unlike PM₁₀, the fine portion of particulate matter (PM_{2.5}) reflects greater contributions from combustion related sources, with less influence from fugitive dust. As a result, the nature of PM_{2.5} in Imperial County differs from PM₁₀. In 1997, U.S. EPA established new PM_{2.5} standards to protect against both 24-hour and annual average exposures. The 24-hour standard was further tightened in 2006, lowering from 65 ug/m³ to 35 ug/m³. PM_{2.5} levels throughout Imperial County have been below the annual standard of 15 ug/m³ since 2003. While Imperial County was recently designated as nonattainment for the revised 24-hour standard, considerable improvement has occurred since 2001. Figure 4 compares 24-hour concentrations at Imperial's three monitoring locations in 2001 and 2008. In 2001, PM_{2.5} levels throughout Imperial County were considered unhealthy. Today, violations of the 24-hour standard are limited to the border site of Calexico, and the standard is exceeded by only 1 ug/m³. Similar to PM₁₀, these elevated levels at Calexico occur during December and January, and are due to transport of emissions from the neighboring city of Mexicali.

Figure 5. Imperial County PM_{2.5} 24-hour Design Values (2001-2008)



3. Ozone

Ozone air quality has also improved significantly in Imperial County in recent years. Both concentrations and the number of exceedance days have decreased between 1997 and 2009. The number of exceedance days dropped from approximately 50 in 1997, to less than 2 in 2009. Imperial County attained the 1997 8-hour ozone standard of 0.08 ppm in 2008. However, the U.S. EPA is in the process of strengthening the 8-hour ozone standard. This new standard is expected to be promulgated in August 2010, in a range of 0.060 and 0.070 ppm. As a result, we expect that Imperial County will be designated as nonattainment for the new standard.

Meeting this more stringent standard in Imperial County will rely heavily on emission reductions in neighboring areas. Ozone levels in Imperial County are affected by transport from several other regions. Typically, transport impacts vary from day-to-day, depending on variations in wind patterns. However, Mexicali has an overwhelming impact on almost all Calexico exceedance days. In the northern area of the County, El Centro and Westmorland ozone levels are impacted by transport from both Mexicali and the South Coast region, as well as from San Diego County in the west.

II. Imperial County PM₁₀ State Implementation Plan

Imperial County has been designated as nonattainment for the federal 24-hour PM₁₀ standard. In order to meet Clean Air Act requirements for nonattainment areas, the Imperial County Air Pollution Control District (District) developed a State Implementation Plan (SIP) in 2009.

A. Planning Requirements

In 1987, U.S. EPA replaced its standard for total suspended particulates with standards that focused solely on PM₁₀. The 1990 Clean Air Act Amendments (Act) subsequently established moderate and serious classifications for PM₁₀ nonattainment areas, with planning requirements applicable to each classification.

1. Moderate Area PM₁₀ Attainment Plan

Imperial County was originally classified as a moderate PM₁₀ nonattainment area which required reasonably available control measures (RACM), and set an attainment deadline of December 31, 1994. The District adopted RACM rules prior to being designated nonattainment. In October 9, 2001, U.S. EPA found that Imperial County attained the PM₁₀ standard "but for" the emissions from outside the United States. However, on December 18, 2001, Earthjustice sued U.S. EPA regarding this determination. Subsequently, on August 3, 2004, U.S. EPA reclassified the Imperial Valley from a moderate to a "serious" PM₁₀ nonattainment area. On December 11, 2007, U.S. EPA determined that the Imperial Valley failed to attain the PM₁₀ standard by the required serious area deadline of December 31, 2001. In response to this finding, a SIP revision was required that provided for attainment of the PM₁₀ standard in the Imperial Valley area as expeditiously as practicable.

2. Serious Area PM₁₀ Attainment Plan

Imperial County developed the 2009 PM₁₀ SIP revision with the following required elements:

- 1) Air Quality Assessment;
- 2) Emission Inventory;
- 3) Best Available Control Measures (BACM) and Best Available Control Technologies (BACT);
- 4) Transportation Conformity Budgets;

III. PLAN EVALUATION

The following sections provide the ARB staff evaluation of the 2009 PM₁₀ SIP with respect to meeting the requirements of the Act.

A. Air Quality Assessment

The central requirement of an attainment SIP is to demonstrate how a region will meet the applicable air quality standard by the federal deadline. Traditionally, the first step in developing an attainment plan is the evaluation of recent air quality data and a determination of the peak concentration around which the control strategy must be designed to reduce concentrations to the level of the standard. This is known as the design value. For PM₁₀, it generally represents the highest measured concentration over a three year period. As part of the development of the 2009 PM₁₀ SIP, District staff evaluated all exceedances that occurred between 2006 and 2008. During this period there were five days which exceeded the standard at various locations within the District. Based upon extensive technical analysis, the District determined that each of the five exceedance days were due to either international transport or high wind natural events.

1. High Wind Natural Events

Imperial County experienced three high wind natural events between 2006 and 2008. Table 3 lists the natural event dates along with the affected monitors, the 24-hour average PM₁₀ levels and the maximum resultant wind speed.

Table 3. Imperial County High Wind Exceptional Events (2006-2008)

Date	Location and Concentration	Max wind speed
September 2, 2006	<ul style="list-style-type: none">• Calexico-Ethel 164 µg/m³, FRM• Calexico-Grant 233 µg/m³, FRM• Westmorland 167 µg/m³, FRM	23 mph
April 12, 2007	<ul style="list-style-type: none">• Brawley 291 µg/m³, FRM• Westmorland 155 µg/m³, FRM	34 mph
June 5, 2007	<ul style="list-style-type: none">• Brawley 281 µg/m³, FRM• Calexico-Ethel 282 µg/m³, FRM• El Centro 200 µg/m³, FRM• Niland 162 µg/m³, FRM• Westmorland 226 µg/m³, FRM	34 mph

On September 2, 2006, the high PM₁₀ levels were primarily the result of wind-entrained dust carried up into the atmosphere by high winds associated with a large thunderstorm system that impacted the southwestern United States and northwestern Mexico. Strong winds were observed on the east, southeast, northeast, and northwest borders of Imperial County, with wind gusts up to 47 mph at the Blythe, Yuma, and Thermal Airports. Air quality monitoring showed that this natural event also influenced PM₁₀ air quality in Yuma, Arizona, and in the Coachella Valley.

On April 12, 2007, strong winds from the west with gusts of 30 mph over the

Anza Borrego Desert entrained dust into the atmosphere and caused two areas in Imperial County to record concentrations in excess of the federal 24-Hour PM₁₀ standard. According to the Imperial Valley Press, winds were so high on April 12, 2007 that they overturned a big-rig, toppled trees, and the Energy Department was put on alert due to wind incidents in Brawley, Imperial, and El Centro. In addition, the California Highway Patrol issued a wind advisory warning motorists to slow down and drive cautiously. This natural event also impacted PM₁₀ air quality in the Mojave Desert and the South Coast.

Similarly, on June 5, 2007, strong winds from the west with gusts of 33 mph over the Anza Borrego Desert entrained dust into the atmosphere and caused all five Imperial County monitors to record concentrations in excess of the federal 24-hour PM₁₀ standard. Gusts as high as 47 mph were recorded at the Imperial Airport. High wind speeds and wind gusts were also recorded at the Blythe, Yuma and Thermal Airports, all of which are in close proximity to the Imperial Valley.

In 2007, U.S. EPA adopted the Exceptional Events Rule (Rule). The Rule recognizes that there are certain naturally occurring, uncontrollable events such as high winds and wildfires that can result in exceedances of federal standards for which it is not appropriate to apply the normal planning process. The Rule therefore allows appropriately documented events to be removed from consideration of a region's attainment status. District staff developed extensive technical documentation for the three wind events that occurred in 2006 and 2007. ARB staff concurred with this analysis and submitted the documentation to U.S. EPA.

2. International Transport Events

Between 2006 and 2008 the remaining two exceedance days at the Calexico monitoring sites were due to international transport - December 21, 2006 and December 25, 2006. The District provided significant documentation in the 2009 PM₁₀ SIP demonstrating the impact of transport and that the PM₁₀ standard would not have been exceeded "but for" emissions from Mexico. The Act contains a specific provision (179B) for areas that are affected by international transport. While exceedances that occur due to international transport are still considered violations of the standard, the Act does not require a State to develop an attainment strategy addressing pollution that stems from international sources.

3. Specific Attainment Demonstration Provisions

In summary, three of the five exceedance days are considered high wind natural events which should be excluded from attainment planning because they are neither controllable nor preventable within the scope of the Act's planning process. The remaining two exceedance days would not have occurred in the absence of contributions from international transport. As discussed previously, the Act does not require an attainment demonstration for these types of events under the international transport provisions of 179B. Therefore, Imperial County is considered to have met the federal PM₁₀ standard "but-for" these events and no attainment demonstration is required. U.S. EPA policy also states that the requirements for reasonable further

progress, a five percent yearly reduction in emissions, and contingency measures are not applicable since their sole purpose is to bring an area into attainment of the standard. Nevertheless, in the 2009 PM₁₀ SIP, Imperial County addressed contingency measures to provide additional assurance that PM₁₀ levels will remain below the standard. These contingency measures reflect reductions from adopted regulations beyond those required for a serious nonattainment area.

B. Emission Inventory

Emission inventories are fundamental elements of any air quality plan, incorporating the effects of growth and existing regulations to determine the expected emissions in future years. The District selected 2005 as the baseline year for the emission inventory and worked closely with ARB staff to improve the emission inventory for Imperial County. To determine the estimated emissions beyond 2005, staff prepared projections that used the baseline emission inventory, expected growth trends, and reductions from rules and regulations. External adjustments and improvements were made to certain source categories in the emission inventory. These adjustments and improvements are discussed in more detail in the 2009 PM₁₀ SIP.

Table 2 presents the updated baseline and projected emission inventory for direct PM₁₀ emissions in the County split by main source category for 2006 through 2010. In 2006, 72 percent (196 tpd) of the total emission inventory was from windblown dust. Area wide dust sources include fugitive dust from paved and unpaved roads, construction, and farming. The other area wide category includes waste burning, residential fuel combustion, and cooking. Stationary sources reflects fuel combustion and other industrial processes. Finally, mobile sources include emissions from both on- and off-road vehicles and equipment. While emission inventories are a required SIP element, it is important to note that understanding the nature of a region's PM₁₀ problem is best characterized by what constituents are measured at the monitors. Analysis of Imperial County data has shown that fugitive dust is the dominant component of PM₁₀.

**Table 2. Imperial County PM₁₀ Annual Average
Emission inventory in 2006-2010 (tpd)**

Source Category	2006	2007	2008	2009	2010
Area Wide Dust Sources	70	69	68	68	67
Other Area Wide Sources	3	3	3	3	3
Stationary Sources	3	3	3	3	3
Mobile Sources	2	2	2	2	2
Subtotal	78	77	76	76	75
Windblown Dust	196	196	196	196	196
Total emissions including windblown	274	273	272	272	271

C. District Control Strategy

The Act requires serious areas PM₁₀ plans to implement Best Available Control Measures (BACM) for area sources and Best Available Control Technologies (BACT) for major stationary sources. According to the 2005 stationary source emission

inventory, there is only one PM₁₀ major stationary source that operates in Imperial County. This source manufactures gypsum wallboard and related products, and is located approximately 20 miles west of the nearest PM₁₀ monitoring site in Plaster City. This source is currently at BACT levels.

BACM is required for all area source categories that are considered significant contributors to violations of the federal PM₁₀ standard. A source category is considered to be significant if its estimated contribution is 5 ug/m³ or higher to the total concentration. The significant source analysis outlined in the Imperial County's 2009 PM₁₀ SIP determined that there were only two significant source categories in Imperial County, agricultural tilling and unpaved road dust.

Although only two source categories required BACM, in 2005 the District developed a comprehensive set of fugitive dust rules collectively known as Regulation VIII, addressing all fugitive dust categories in the inventory. The categories covered include:

- Construction and Earthmoving Activities
- Bulk Materials
- Carry-Out and Track-Out
- Open Areas
- Paved and Unpaved Roads
- Agricultural Conservation Management Practices

The two significant BACM sources are specifically controlled under rules 806 (Agricultural Conservation Management Practices) and 805 (Paved and Unpaved Roads). The selection of control approaches was based upon an assessment of rules in other PM₁₀ nonattainment areas and their specific applicability to Imperial County. The adopted controls include watering or chemical stabilization of unpaved roads, cleaning up dust from paved roads, preventing track-out from construction sites, requiring dust control plans for federal lands, and application of dust reducing conservation management practices such as providing cover crops or reduced tillage on agricultural lands. The fugitive dust rules are expected to reduce PM₁₀ emissions by over 16 tpd by 2015. In addition to these reductions, the Bureau of Land Management implements additional controls for windblown dust and the Imperial Irrigation District's Fallowing Program reduces dust from fallow fields.

These rules were developed through a public process that included representatives of the agricultural community, private industry, Coalition of Labor and Business, Farm Bureau, Bureau of Land Management, Border Patrol, Imperial Irrigation District, County Public Works Department, ARB, and U.S. EPA. The District held six public workshops to solicit comments. ARB staff reviewed the rules at that time and supported the District's adoption of these rules as BACM. In addition, at the Imperial County Board hearing, U.S. EPA staff testified that they believed that the Imperial County fugitive dust rules represented BACM level controls. Subsequent to their adoption, ARB staff submitted the rules to U.S. EPA in 2006 for adoption into the SIP. No action was taken by U.S. EPA until February 2010, at which time U.S. EPA proposed a partial approval of the rules, but also identified several rule components which they believed required

additional analysis in order to demonstrate BACM level equivalence. When evaluating BACM, U.S. EPA does not have specific defined criteria, but rather the analysis is done on a case by case basis, reflecting the nature of the sources in the region, and considering cost-effectiveness. Because of this, ARB staff believes that given the specific nature of sources in Imperial County, the rules continue to reflect an appropriate BACM level of control.

However, the District continues to look for cost-effective rule improvements that would further improve air quality. As discussed in the letter contained in Appendix A, the District has committed to additional rule improvements that would represent a strengthening of the SIP for Imperial County. These changes include more specific controls for off-highway vehicles, revising the conservation management practices application forms to be more specific on the required controls and frequency, narrowing the exemption and specifying dust control measures required for Border Patrol unpaved roads, and adding windblown dust controls for fallowed land. In a separate effort Imperial County is also in the process of updating their Smoke Management Plan to enhance public outreach and include a “good neighbor policy” to alert nearby residents of an upcoming burn. ARB staff support these efforts for the purpose of further improving public health in the region.

D. Other Clean Air Act Requirements

1. Transportation Conformity Budgets

The 2009 PM₁₀ SIP establishes on-road motor vehicle emissions budgets for the years 2010, 2020, 2030, and 2035. The new emissions budgets for PM₁₀ are shown in Table 4. The budgets are derived with EMFAC2007 projections and matched to activity data reported by the South Coast Association of Governments (SCAG). The new budgets will become applicable when U.S. EPA finds the budgets adequate. The conformity budgets are based on the average annual daily emissions for the Imperial County nonattainment area. The emissions budgets established in this Plan fulfill the requirements of the Act and U.S. EPA regulations to ensure that transportation activities support progress and attainment of the PM₁₀ standards.

**Table 4. Motor Vehicle Emission Budgets for PM₁₀*
Imperial County, Annual Average, Tons per Day**

	2010	2020	2030	2035
EMFAC Output*	0.8	0.7	0.8	0.9
Paved Road Dust	3.9	6.5	7.9	8.5
Unpaved Road Dust	24.5	24.5	24.5	24.5
Road Construction Dust	0.5	0.4	1.4	1.9
Reductions from District Rules **	4.5	8.8	9.1	9.2
Total	25.1	23.3	25.5	26.5
Motor Vehicle Emission Budgets	26	24	26	27

(rounded up to the nearest ton)

* EMFAC 2007 with Imperial County activity provided by SCAG April 2009.

** Reductions from Imperial County APCD rules 801, 803 and 805.

IV. STAFF RECOMMENDATIONS

ARB staff has reviewed Imperial County's 2009 PM₁₀ SIP and finds that the SIP meets all applicable CAA requirements. Therefore, we recommend that the Board adopt the Imperial County 2009 PM₁₀ SIP, including updated transportation conformity budgets, and emission inventory, as a revision to the California SIP for submittal to U.S. EPA.

APPENDIX A

DISTRICT 1
LOUIS FUENTES

DISTRICT 2
JACK TERRAZAS

DISTRICT 3
MICHAEL W. KELLEY

DISTRICT 4
GARY WYATT

DISTRICT 5
WALLY LEIMGRUBER

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Board of Supervisors

County of Imperial

April 6, 2010

Mary Nichols

Chair of the Board

California Air Resources Board

1001 "I" Street

Sacramento CA. 95812

RE: Imperial County PM10 SIP

Dear Ms. Nichols:

The Imperial County APCD has prepared and approved a PM10 State Implementation Plan (SIP) as required by the federal Clean Air Act, and submitted the SIP to the Air Resources Board for consideration. PM10 air quality in Imperial County has improved to the extent that over the past three years the federal standard has been exceeded a total of just seven days. All of these days exceeded the standard as a result of wind events or air pollution transport from Mexico. The Clean Air Act and US EPA rules include provisions to account for the fact that these types of events are uncontrollable by the states, and that SIPs are not required to be designed to address these types of events. Fortunately, these events are relatively rare.

Over the past several years, the Imperial County APCD has diligently and proactively adopted and implemented a series of rules designed to reduce fugitive dust, the primary component of PM10 in Imperial County, in an effort to attain the health based standard as expeditiously as possible. It should not go without notice, that the application of these adopted rules have successfully reduced violations of the PM10 standard, with the exceptions as noted above, and form the basis of the emission control strategy for fugitive dust contained in the PM10 SIP on August 11, 2009, the Imperial County APCD found that this emission control strategy meets the applicable Clean Air Act requirements and should be approved by ARB and the US EPA.

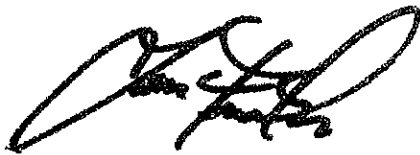
At the same time, the Imperial County APCD continues to look for cost-effective rule improvements that would help improve air quality. Our staff has once again reviewed the adopted fugitive dust rules, and has identified potential rule improvements that would further enhance the existing SIP for Imperial County. This Board has directed staff to continue their efforts to explore and develop appropriate amendments in order to further improve fugitive dust rules to maximize public health benefits.

The Imperial County APCD is committed to continuing this development of cost-effective rule amendments to further enhance the existing SIP. The amendments will address the concepts described in Attachment 1. The APCD will make every attempt possible to bring the proposed amendments to a public hearing for adoption before the end of December 2010. The rules will be sent to ARB for administrative submittal to US EPA. To expedite the process, we request that ARB technical staff review the amendments consistent with the existing rule review protocol established between ARB and the California Air Pollution Control Officers Association.

The Imperial County APCD Board of Directors requests ARB support for these further PM10 rule improvements designed to improve public health. We also want to recognize the importance of ARB rules, programs, and assistance in improving our air quality. California's most significant health risks from air pollution are due to PM2.5 and ozone exposures in communities. The key pollutant that forms PM2.5 and ozone is NOx (oxides of nitrogen), which continues to decrease each year in Imperial County. As emissions have decreased, air quality has improved to such an extent that Imperial County now meets the current federal ozone and annual PM2.5 standards.

The air quality improvements reflect the importance of California's state and local air pollution control programs. Accordingly, as always, the Imperial County APCD will continue to look for further opportunities to improve air quality in Imperial County. We also want to continue working with US EPA to help improve air quality at the California-Mexico border. While Clean Air Act requirements recognize that the states and local air agencies are not responsible for mitigating international transport, Imperial County APCD will continue our cooperative efforts and collaboration with ARB, US EPA, and Mexico, and explore innovative ways to addressing the impacts of air pollution transport on public health.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis A. Fuentes", with a large, stylized flourish at the end.

Louis A. Fuentes

Chairman

ATTACHMENT 1

In order to further enhance the Imperial County PM10 SIP, the ICAPCD is committed to the following:

1. Related to Open Areas

a. Recreational Off-Highway Vehicle (OHV) Activity

Revise Rule 800 to address the following:

- Direct applicability of Rules 804 and 805 to recreational OHV areas not feasible; therefore, Imperial will develop specific dust control measures for unpaved roads and open areas to be included in dust control plans for recreational OHV areas.
- State and BLM will address PM10 mitigation for recreational OHV areas under their control through dust control plans.
- Limit OHV activity during the summertime
- Include a definition for “disturbed surface area”

2. Related to Unpaved Roads

a. Border Patrol Roads

- Revise Rule 800 to narrow exemption and specify dust control measures for unpaved roads that need to be included in Border Patrol’s dust control plan that are not in direct contradiction with their mission.

3. Related to Agricultural Lands

a. Tiling and Harvesting

- Revise the CMP application forms to be more specific on the required controls and frequency of CMPs for land preparation and cultivation (including tiling) and harvesting activities.

b. Windblown dust from fallow fields

- Develop and adopt a new rule and application forms to require CMPs to control windblown dust from agricultural fallowed parcels.